

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

BRANDON MIS,

Plaintiff,

vs.

Case No.: 23-cv-12941

Hon.

GREYHOUND LINES, INC. and  
NATHANIEL GRIFFIN, jointly and severally,

Defendants.

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**NOTICE OF REMOVAL OF CAUSE TO THE UNITED STATES  
DISTRICT COURT EASTERN DISTRICT OF MICHIGAN,  
SOUTHERN DIVISION**

TO: Adrienne D. Logeman  
Attorneys for Plaintiff

NOW COME the Defendants, GREYHOUND LINES, INC. and NATHANIEL GRIFFIN, by and through their attorneys Garan Lucow Miller, P.C., and in support of this Notice of Removal of Cause to the United States District Court for the Eastern District of Michigan, Southern Division, states as follows:

1. That on October 18, 2023, Plaintiff Brandon Mis commenced this cause of action in the Circuit Court for the County of Washtenaw, State of

Michigan, by filing his Summons and Complaint against the Defendants, Greyhound Lines, Inc. and Nathaniel Griffin (**Exhibit A** – Plaintiff’s Complaint).

2. On or about October 23, 2023, Plaintiff did serve Plaintiff’s Summons and a partial copy of the Complaint on Defendant, Greyhound Lines, Inc. by mail. (**Exhibit B** – Summons and Partial Complaint).

3. That this action is a suit at common law of a civil nature and the amount involved, exclusive of interest and costs, and upon information and belief, as based upon representations and allegations of the Plaintiff, Brandon Mis, of injuries and damages claimed by the Plaintiff against the Defendants, is in excess of the sum of \$75,000 (**Exhibit A**) and is otherwise within the jurisdiction of this Court pursuant to 28 USC §1332(a).

4. Plaintiff alleges damages as the result of an alleged motor vehicle accident occurring on or about June 26, 2023 against the Defendants which is described in Plaintiff’s Complaint in Paragraphs 4, 5 and 7 (a) through (f) of Plaintiff’s Complaint, all of which allege damages as follows:

4. At all times relevant therein, Defendant Greyhound Lines, Inc., was the sole and exclusive owner of abus being driven by employee/Defendant Nathaniel Griffin, at the time of the accident
5. That on June 26, 2023, the Plaintiff was struck by the bus while crossing the road as a pedestrian in Ann Arbor, Michigan.

7. As a direct and proximate result of the negligence of the Defendant, Plaintiff suffered serious injury and/or aggravation of some pre-existing condition and may in the future suffer or may permanently suffer mental anguish, pain and suffering, injuries and limitations, including serious impairment of body function, some of which said injuries are, but not exclusively, as follows:
  - a. Traumatic brain injury, broken ribs and broken collarbone, well as other related and appreciable difficulties and consequences;
  - b. Pain, suffering and mental anguish;
  - c. Wage loss or actual future loss of earnings to the extent that such losses are recoverable in excess of the no fault statutory monthly and yearly maximums as found applicable to the cause;
  - d. Loss of services;
  - e. Medical care;
  - f. Such other damages, injuries and consequences as found to be related during the course of discovery and recoverable under the Michigan No-Fault Act.

5. Therefore based upon the foregoing allegations of damages as contained in Plaintiff's Complaint, Plaintiff's alleged damages against the Defendants are claimed to have a value in excess of the sum of \$75,000 and are otherwise within the jurisdiction of this Court pursuant to 28 USC §1332(a).

6. Defendants show this Honorable Court that this action involves a controversy between Citizens of different states and that:

(A) Plaintiff, Bradon Mis, was, at the time of the commencement of this action and now is a citizen of the County of Washtenaw, State of Michigan. (**Exhibit A** Paragraph 1).

(B) Defendant Greyhound Lines, Inc., at the time of the commencement of this action, was, and now is, incorporated under the laws of the State of Delaware, and by virtue of said incorporation was, and is, a citizen of the State of Delaware, and is not a citizen of the State of Michigan by virtue of its state of incorporation.

(C) Defendant Greyhound Lines, Inc., had, at the time of the commencement of this action, and now has, its principal place of business in the State of Texas, and is not a citizen of the State of Michigan by reason of its principal place of business.

(D) That Defendant Nathaniel Griffin, was, at the time of the commencement of this action, and now is, a citizen of the State of Indiana, and is not a citizen of the State of Michigan.

7. That this Notice of Removal is filed with this Court within 30 days of the service of Plaintiff's Complaint on the Defendant Greyhound Lines, Inc. on October 23, 2023. (**Exhibits A and B**). Therefore, this removal is filed within 30 days of the commencement of this action and the service on Defendant Greyhound Lines, Inc. as required by 28 USC §1332(a).

8. That written notice of filing of this removal has been given to all adverse parties as required by law and a copy of the Notice of Removal has been filed with the Clerk of the Court for the County of Washtenaw, State of Michigan by regular mail.

9. Attached is a copy of all process and pleadings which were served upon Defendant, Greyhound Lines, Inc. in this cause. (**Exhibit B**).

WHEREFORE, Defendants Greyhound Lines, Inc. and Nathaniel Griffin respectfully pray that this Honorable Court enter its Order removing this cause from the Circuit Court for the County of Washtenaw, State of Michigan, to the United States District Court, Eastern District of Michigan, Southern Division.

s/DANIEL K. KEITH  
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Dated: November 20, 2023  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2023, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following: All ECF Attorney(s) of Record on this case.

and I hereby certify that I have mailed by United States Postal Service the paper to the following:

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s/Daniel K. Keith  
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